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9 Attorney for John Tam, Jamie Yang,  
10 and Corey Fong

11 UNITED STATES DISTRICT COURT  
12  
13 NORTHERN DISTRICT OF CALIFORNIA

14 ACTIVISION PUBLISHING, INC., a  
15 Delaware corporation,

16 Plaintiff,

17 vs.

18 JOHN TAM, an individual, JAMIE YANG, an  
19 individual, et al.,

20 Defendants.

) Case No. C 07-03536 MEJ

)  
) ADMINISTRATIVE MOTION TO FILE  
) UNDER SEAL UNREDACTED MOTION  
) FOR ORDER DETERMINING A GOOD  
) FAITH SETTLEMENT BETWEEN  
) PLAINTIFF AND DEFENDANTS JOHN  
) TAM, JAMIE YANG AND COREY FONG,  
) AND DECLARATIONS OF RICHARD  
) CAULEY AND YEE-HORN SHUAI ; AND  
) TO FILE UNREDACTED REPLY TO  
) OPPOSITION TO MOTION FOR ORDER  
) DETERMINING A GOOD FAITH  
) SETTLEMENT BETWEEN PLAINTIFF  
) AND DEFENDANTS JOHN TAM, COREY  
) FONG AND JAMIE YANG; AND  
) DECLARATIONS OF JOHN TAM, JAMIE  
) YANG AND COREY FONG SUPPORT  
) THEREOF;

)  
) DECLARATION OF YEE-HORN SHUAI  
) [filed concurrently herewith] ; AND

) [PROPOSED] ORDER

)  
) Date: August 30, 2007  
) Time: 10:00 AM  
) Dept.: Courtroom B, 15<sup>th</sup> Fl.  
) Judge: Honorable Maria-Elena James

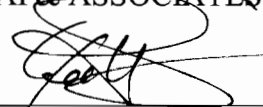
21 Pursuant to Civil Local Rule 79-5, Defendants John Tam, Jamie Yang and Corey Fong  
22 (hereinafter collectively "Tam Defendants") hereby submit their Administrative Motion to File  
23 Under Seal Their unredacted Motion for Order Determination Good Faith Settlement between  
24  
25

1 Plaintiff and John Tam, Jamie Yang and Corey Fong (Motion), Declarations of Richard Cauley  
2 and Yee-Horn Shuai (Declarations 1); **and** unredacted Reply to Oppositions to Motion for Order  
3 Determining Good Faith Settlement ("Reply") and the Declarations of Jamie Yang, John Tam,  
4 Corey Fong and Yee-Horn Shuai ("Declarations 2") in support thereof, because those documents  
5 contain information regarding confidential settlement agreements entered into by and between  
6 the parties, as well as confidential financial information, such as salary information, that must  
7 remain confidential in order to protect the privacy of those individuals.

8 The parties have all agreed to maintain the confidentiality of said information, and thus  
9 the Tam Defendants respectfully request that the unredacted Motion , Reply and the Declarations  
10 1 and 2 be filed under seal.

11 Dated: August 15, 2007

SHUAI & ASSOCIATES



Yee-Horn Shuai, Attorney for defendants  
John Tam, Corey Fong and Jamie Yang

16 **IT IS SO ORDERED:**

18 Dated: \_\_\_\_\_

Honorable Maria Elena James  
Judge of the United States District Court

**Yee-Horn Shuai, Esq.**  
**SHUAI & ASSOCIATES**  
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Attorney for John Tam, Jamie Yang,  
and Corey Fong

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ACTIVISION PUBLISHING, INC., a  
Delaware corporation,

Plaintiff,

vs.

JOHN TAM, an individual, JAMIE YANG, an  
individual, et al.,

Defendants.

) Case No. C 07-03536 MEJ

)  
) DECLARATION OF YEE-HORN SHUAI IN  
) SUPPORT OF ADMINISTRATIVE  
) MOTION TO FILE UNDER SEAL

)  
) Date: August 30, 2007  
) time: 10:00 AM  
) Dept.: Courtroom B, 15<sup>th</sup> Floor  
) Judge: Maria Elena James

I, Yee-Horn Shuai, hereby declare as follows:

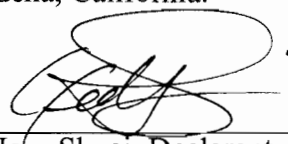
1. I am an attorney at the law firm of Shuai & Associates, attorneys for the defendant John Tam, Jamie Yang and Corey Fong (hereinafter collectively "Tam Defendants"). I make this declaration in support of Tam Defendants' Administrative Motion to File Under Seal. I have personal knowledge of the following, and if called upon as a witness, I could and would competently testify thereto.

2. The Motion for Order Determining Good Faith Settlement between Plaintiff and Defendants John Tam, Jamie Yang and Corey Fong ("Motion") and the Declarations Richard Cauley and Yee-Horn Shuai ("Declarations 1"); and Reply to Oppositions to Motion for Order Determining Good Faith Settlement ("Reply") and the Declarations of Jamie Yang, John Tam, Corey Fong and Yee-Horn Shuai ("Declarations 2") in support thereof, contain information regarding confidential settlement agreements entered into by and between the parties, as well as

1 confidential financial information, such a personal financial conditions information, that must  
2 remain confidential in order to protect the privacy of those individuals. The parties to this  
3 lawsuit have all agreed to maintain the confidentiality of said information, and have designated  
4 the documents attached as Exhibits A-D to the Declaration to Richard Cauley as being  
5 confidential, pursuant to the Joint Stipulated Protective Order signed by all of the parties and so  
6 ordered by the United States Magistrate Judge on January 31, 2007.

7 I certify and declare under penalty of perjury under the laws of the State of California that  
8 the forgoing is true and correct.

9 Dated this 15<sup>th</sup> day of August 2007, at Pasadena, California.

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13 Yee-Horn Shuai, Declarant  
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